

**U.S. Department of Justice** 

United States Attorney Eastern District of New York

JMM:SK F. #2013R00948 610 Federal Plaza Central Islip, New York 11722

August 27, 2014

## By FedEx & ECF

Joseph Conway, Esq. LaRusso & Conway 300 Old Country Road, Suite 341 Mineola, NY 11501

Re: United States v. Tommy C. Constantine

Criminal Docket No. 13-607 (JFB)

## Dear Counsel:

Enclosed please find discovery provided by the government in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the discovery provided on January 16, 2014, January 23, 2014, February 10, 2014, March 6, 2014, March 11, 2014, March 24, 2014, April 11, 2014, May 21, 2014, June 6, 2014, August 6, 2014, August 15, 2014, August 20, 2014 and August 22, 2014. The government renews its request for reciprocal discovery.

## Enclosed please find the following:

- Agent notes reflecting statements made by Constantine during an interview on December 5, 2012 (related to the FBI report previously provided by letter dated March 6, 2014); and
- Calls, emails, and records obtained from the Bureau of Prisons (bates-numbered TC CALLS 1-5 and TC EMAILS).

The government will continue to provide discovery. Please contact me or AUSA James Miskiewicz if you have any questions or requests.

Very truly yours,

LORETTA E. LYNCH United States Attorney

By: /s/Saritha Komatireddy
Saritha Komatireddy
James M. Miskiewicz
Assistant U.S. Attorneys

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## Enclosures

cc: Clerk of the Court (JFB) (by ECF) (without enclosures)